



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AXB
F. #2018R2095

271 Cadman Plaza East
Brooklyn, New York 11201

March 15, 2019

By ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
Brooklyn, New York 12201

Re: United States v. Insun Yun
Criminal Docket No. 19-131 (AMD)

Dear Judge Donnelly:

The parties to the above-referenced matter have reached a plea agreement, pursuant to which the defendant has agreed to waive indictment by the grand jury and plead guilty to a felony information. On March 11, 2019, the government filed a notice of intent to proceed in this manner pursuant to Federal Rule of Criminal Procedure 7(b). Therefore, the government respectfully requests that the Court schedule a plea hearing at its earliest convenience.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Anthony Bagnuola
Anthony Bagnuola
Assistant U.S. Attorney
(718) 254-6232

cc: Counsel of record (by ECF)